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COUNTY OF ALAMEDA, GREGORY

AHERN, BRETT KETELES, CARLA

KENNEDY, DAVID BRADY, GREGORY

MORGADO and KERRY JACKSON

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

STEVEN ANGELL, MILES AVERY, MOLLY)

BATCHELDER, SRI LOUISE also known as)

Louise Coles, CICILY COOPER, SHAREEF)

ELFIKI, THEODORE HEXTON, LINDSAY)

WEBER, Individually and on behalf of others)

similarly situated,)

Plaintiffs,

vs.

CITY OF OAKLAND, COUNTY OF)

ALAMEDA, HOWARD JORDAN, JEFFREY)

ISRAEL, ERIC BRESHEARS, RON YELDER,)

DARREN ALLISON, STEVE TULL,)

EDWARD TRACEY, ANTHONY RACHAL,)

SEAN WHENT, GREGORY J. AHERN,)

BRETT KETELES, CARLA KENNEDY,)

DAVID BRADY, GREGORY L. MORGADO,)

KERRY JACKSON, DOES 1-250,)

Defendants.

Case No.: C13-0190 NC

**STIPULATION TO CONTINUE
PLAINTIFFS' DEADLINE FOR FILING
MOTION FOR CLASS CERTIFICATION
AND CASE MANAGEMENT
CONFERENCE AND ALL RELATED
DATES AND ~~PROPOSED~~ ORDER**

Complaint Filed: January 14, 2013

The parties herein hereby stipulate and jointly apply to the Court for relief from existing deadlines in the above-referenced matter as follows:

-1-

STIPULATION TO CONTINUE PLAINTIFFS' DEADLINE FOR FILING MOTION FOR CLASS CERTIFICATION AND CASE MANAGEMENT CONFERENCE AND ALL RELATED DATES AND ~~PROPOSED~~ ORDER

Steven Angell, et al. vs. City of Oakland, et al.; USDC-Nor Dist. Case No. C13-0190 NC

1 The parties have participated in settlement conferences with Magistrate Judge Laurel
 2 Beeler on January 13, February 24 and April 8, 2014. The parties and Judge Beeler feel that good
 3 progress has been made toward reaching a resolution of the plaintiffs' claims, and that a further
 4 settlement conference would be beneficial. Judge Beeler and the parties have agreed to have a
 5 fourth settlement conference on June 27, 2014 at 10:30 a.m. The parties and Judge Beeler also feel
 6 that the interests of justice will be served, and the potential for a resolution of this matter will be
 7 improved, if the current deadline for the plaintiffs to file a motion for class certification is
 8 continued to permit the settlement process to continue.

9 As a consequence, the parties jointly request that the Court continue the present deadlines
 10 for completion of the settlement conference with Judge Beeler, for filing the motion for class
 11 certification and the joint case management conference statement and the date of the case
 12 management conference as follows:

13 Completion of settlement conference with Judge Laurel Beeler: July 31, 2014

14 Last date for plaintiffs to file motion for class certification: August 6, 2014

15 Filing of joint case management conference statement: September 17, 2014

16 Case management conference: September 24, 2014 at 10:00 a.m.

17 DATED: April 28, 2014

18 YOLANDA HUANG, ESQ.

19
 20 By: /s/ Yolanda Huang

21 YOLANDA HUANG, ESQ.
 Attorneys for Plaintiffs

22 DATED: April 2, 2014

23 SIEGEL & YEE

24
 25 By: /s/ Dan Siegel

26 DAN SIEGEL, ESQ.
 Attorneys for Plaintiffs

1 DATED: April 28, 2014

2 BARBARA J. PARKER, City Attorney
3 JAMES F. HODGKINS, Supervising Trial
4 Attorney

5 By: /s/ James F. Hodgkins
6 JAMES F. HODGKINS, ESQ.
7 Attorneys for Defendants
8 CITY OF OAKLAND, et al

9 DATED: April 28, 2014

10 BOORNAZIAN, JENSEN & GARTHE
11 A Professional Corporation

12 By: /s/ Gregory J. Rockwell
13 GREGORY J. ROCKWELL, ESQ.
14 Attorneys for Defendants
15 COUNTY OF ALAMEDA, et al.

ORDER

GOOD CAUSE appearing therefor, and the parties having so stipulated, the Court hereby GRANTS the parties' joint application for continuance of all existing deadlines and hearing and filing dates as follows:

Completion of settlement conference with Judge Laurel Beeler: July 31, 2014

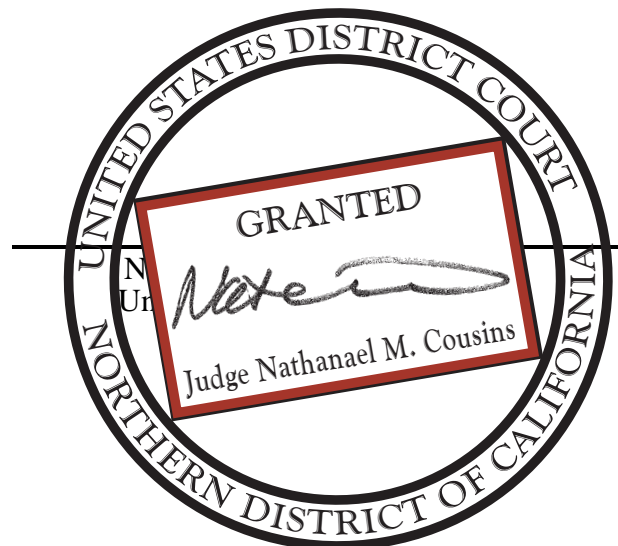
Last date for plaintiffs to file motion for class certification: August 6, 2014

Filing of joint case management conference statement: September 17, 2014

Case management conference: September 24, 2014 at 10:00 a.m.

IT IS SO ORDERED

Dated: April 28, 2014



PROOF OF SERVICE BY ELECTRONIC SERVICE

I, the undersigned, declare as follows:

I am employed in the County of Alameda, State of California. I am over the age of 18 years and not a party to the within action. My business address is 555 12th Street, Suite 1800, P. O. Box 12925, Oakland, California 94604-2925.

On the date indicated below, at the above-referenced business location, I served the **STIPULATION TO CONTINUE PLAINTIFFS' DEADLINE FOR FILING MOTION FOR CLASS CERTIFICATION AND CASE MANAGEMENT CONFERENCE AND ALL RELATED DATES AND [PROPOSED] ORDER** on the below-named party and caused said document to be transmitted using ECF as specified by General Order No. 45 to the following party:

Yolanda Huang, Esq. P.O. Box 5475 Berkeley, CA 94705 Tel: (510) 329-2140 Fax: (510) 580-9410 Dan Siegel, Esq. Anne Weills, Esq. SIEGEL & YEE 499 14 th Street, Suite 300 Oakland, CA 94612 Tel: (510) 839-1200 Fax: (510) 444-6698	Attorneys for Plaintiffs STEVEN ANGELL, MILES AVERY, MOLLY BATCHELDER, SRI LOUISE also known as Louise Coles, CICILY COOPER, SHAREEF ELFIKI, THEODORE HEXTON, LINDSAY WEBER, Individually and on behalf of others similarly situated
Barbara J. Parker, Esq. Randolph W. Hall, Esq. Oakland City Attorney's Office One Frank H. Ogawa Plaza, 6th Fl. Oakland, CA 94612 Tel: (510) 238-7686 Fax: (510) 238-6500 E-mail: rhall@oaklandcityattorney.org	Attorneys for Defendants CITY OF OAKLAND, et al.

STIPULATION TO CONTINUE PLAINTIFFS' DEADLINE FOR FILING MOTION FOR CLASS CERTIFICATION AND CASE MANAGEMENT CONFERENCE AND ALL RELATED DATES AND [PROPOSED] ORDER

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E-mail: wsimmons@lozanosmith.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at Oakland, California, on April 28, 2014.

/s/ Candace Hankins

Candace Hankins

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